

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
KENNETH AND PAMELA PRICE JEAN	)	CIVIL ACTION NO. 03-12306-MLW
Plaintiff,	)	
	)	
v.	)	
	)	
CITY OF ASHBURNHAM POLICE	)	
DEPARTMENT, CITY OF WINCHENDON	)	
POLICE DEPARTMENT, ROB HARRINGTON,	)	
in his capacity as CHIEF OF THE WINCHENDON	)	
POLICE DEPARTMENT, JACK MURRAY, in his	)	
capacity as CHIEF OF THE ASHBURNHAM	)	
POLICE DEPARTMENT, TODD C. PARSONS,	)	
RAYMOND M. ANAIR, ROBERT BRENNON,	)	
WILLIAM P. GEOFFROY, BRIAN HART,	)	
KEVIN AHEARN, KEVIN E. WOLSKI,	)	
OFFICER JOHN DOE, OFFICER JOHN POE,	)	
Defendants.	)	
_____	)	

**JOINT STATEMENT**

Pursuant to Local Rule 16.1(D) and this Court's Notice of Scheduling Conference, the parties hereby report to the Court as follows:

I. **AGENDA FOR SCHEDULING CONFERENCE**

The parties suggest the following agenda of matters to be discussed at the conference:

- i. The proposed scheduling plan for discovery and motions;
- ii. The positions of the parties regarding settlement;
- iii. The plaintiffs suggest it will be necessary to conduct more than the presumptive limit of 10 depositions under Local Rule 26.1(c) due to the number of named defendants and potential witnesses.

II. **COMPLIANCE WITH LOCAL RULE 16.1(D)**

- A. Fact Discovery will end on June 14, 2005;
- B. Plaintiffs will disclose their expert(s) by July 14, 2005;

- C. Defendants will disclose their expert(s) by August 14, 2005;
- D. All Expert Depositions shall be completed by September 14, 2005;
- E. Dispositive Motions:

Dispositive Motions shall be filed by October 14, 2005.

Responses to dispositive motions will be filed by November 14, 2005.

Oral Argument on the motions will take place before December 14, 2005 or such other time as the Court deems appropriate.

- F. Pretrial Conference:

The parties request a pretrial conference after a decision on the dispositive motions.

The parties suggest January 14, 2005 with trial scheduled in the weeks following.


IV. CERTIFICATIONS:

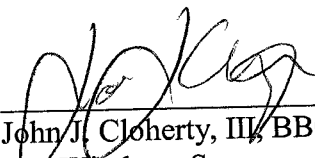
Certifications required by L.R. 16.1(D)(3) are being filed separately with the court.

Respectfully submitted,

The plaintiffs,  
KENNETH and PAMELA PRICE JEAN,  
By their attorney,

The defendants,  
CITY OF ASHBURNHAM POLICE  
DEPARTMENT, JACK MURRAY, TODD  
PARSONS, ROBERT BRENNON, BRIAN  
HART and KEVIN AHEARN,  
By their attorneys,  
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DEPARTMENT, ROB HARRINGTON,  
RAYMOND M. ANAIR; WILLIAM P.  
GEOFFROY and KEVIN WOLSKI,  
By their attorneys,

  
Nancy Frankel Pelletier

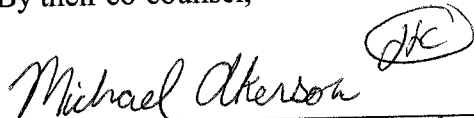
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